

UNITED STATES
VS
KIRK RINALDI

UNITED STATES DISTRICT COURT
IN CLERKS OFFICE
DISTRICT OF MASSACHUSETTS
2005 MAR 21 P 12:03

U.S. DISTRICT COURT
DISTRICT OF MASS.

NO. 03-CR-10385-RGS

MOTION TO WITHDRAW AS DEFENSE COUNSEL

The undersigned hereby moves to withdraw as defense counsel for the defendant, Kirk Rinaldi, because the defendant has communicated that he believes undersigned counsel has been (a) dilatory in his efforts on defendant's behalf, (b) has failed to pursue assignments he has tasked counsel with, and (c) that there has been a lack of communication and commitment by counsel with the defendant, so that the defendant no longer has faith or trust in counsel's work.

Wherefore, in the interest of justice the court should allow the undersigned's withdrawal as defense counsel in this case and that a substitute counsel be appointed for the defendant.

March 21, 2005



Karnig Boyajian (BBO#052080)
Defendant's Attorney
One Gateway Center, Suite 315
Newton, MA 02458
Tel. 617-332-222
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CERTIFICATE

I hereby certify a copy of the within motion was this date delivered, faxed and/or mailed postage prepaid to AUSA Christopher Bator, c/o U.S. Attorney's Office, One Courthouse Way, Suite 9200, Boston, MA, 02110.

March 21, 2005

Karnig Boyajian